

FILED

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CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

BY  DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2010 Grand Jury

10CR 3044 WQH

UNITED STATES OF AMERICA,

Case No.

Plaintiff,

I N D I C T M E N T

v.

Title 18, U.S.C., Sec. 1962(d) -
Conspiracy to Conduct Enterprise
Affairs Through A Pattern of
Racketeering Activity;
Title 18, U.S.C., Sec. 1963 -
Criminal Forfeiture

ARMANDO VILLAREAL HEREDIA (1),

aka Gordo,

aka Gordo Villareal,

RUBEN DARIO CASTRO PEREZ (2),

aka Compadre,

aka Choques,

IVAN CANDELARIO

MAGANA HEREDIA (3),

aka Soldado,

JOSE ALFREDO NAJERA GIL (4),

CARLOS COSME (5),

MARIO ESCAMILLA (6),

aka Unico,

IGNACIO ESCAMILLA ESTRADA (7),

aka Uno,

aka Senor,

FAUSTO ESCAMILLA ESTRADA (8),

aka Taliban,

EDGAR GUSTAVO ESCAMILLA (9),

aka Dies,

JESUS QUINONES MARQUEZ (10),

aka Rinon,

JOSE ANTONIO ORTEGA NUNO (11),

EDGAR LOPEZ DE-ANDA DAHER (12),

aka Pollito,

JOSE ALEJANDRO FLORES MEZA (13),

aka Shakira,

ALICIA MARTINEZ (14),

aka Comadre,

JUAN CARLOS MAGANA HEREDIA (15),

OSCAR DANIEL MONTOYA MORA (16),

JORGE ALBERTO

RAMIREZ PONCE (17),

aka Betote,

OMAR MARTINEZ (18),

aka Nino,

TWR:lml:San Diego

7/28/10

1 JONATHAN VALLE (19),)
aka Reaper,)
2 ARMANDO CASTILLO (20),)
aka Choco,)
3 MIKAEL DANIEL BLASER (21),)
aka Troubles,)
4 ENRIQUE SALINAS, JR. (22),)
aka Playboy,)
5 RAUL MORENO (23),)
aka Flaco,)
6 MIGUEL SORIA (24),)
aka Mikey,)
7 PERLA YADIRA FLORES (25),)
aka P,)
8 LUZ MARIA BENAVIDEZ)
MARTINEZ (26),)
9 aka Araceli,)
BRIDGETTE REYNOSO (27),)
10 aka B,)
JORGE HUMBERTO LORA (28),)
11 aka Georgie,)
CHRISTOPHER ADRIAN RUIZ (29),)
12 aka Sneaky,)
RICHARD GILBERT FAVELA (30),)
13 aka Tiny,)
HUMBERTO TORRES MENDOZA (31),)
14 aka Tito,)
JUAN CARLOS RIQUE AGUIRRE (32),)
15 aka JC,)
TELLIE KRESCHMER (33),)
16 HECTOR MONTES (34),)
aka Toxic,)
17 aka Little Spikey,)
JOSE CONTRERAS (35),)
18 aka Pepe,)
aka Dandi,)
19 HASSAIN ALZUBAIDY (36),)
aka Arab,)
20 OMAR MORA (37),)
ULISES VALENZUELA (38),)
21 BENJAMIN AVENDANO (39),)
aka Peso,)
22 JENNIFER ESCAMILLA (40),)
ARACELI VARELA (41),)
23 aka Uvia,)
ROCIO LOPEZ (42),)
24 KEVIN LUIS (43),)
aka Listo,)
25)
26 Defendants.)

27 The grand jury charges:

28 //

TWR:lm1:San Diego
7/28/10

Count 1

THE ENTERPRISE

1. At various times material to this Indictment:

a. Defendants ARMANDO VILLAREAL HEREDIA, aka Gordo, aka Gordo Villareal, RUBEN DARIO CASTRO PEREZ, aka Compadre, aka Choques, IVAN CANDELARIO MAGANA HEREDIA, aka Soldado, JOSE ALFREDO NAJERA GIL, CARLOS COSME, MARIO ESCAMILLA, aka Unico, IGNACIO ESCAMILLA ESTRADA, aka Uno, aka Senor, FAUSTO ESCAMILLA ESTRADA, aka Taliban, EDGAR GUSTAVO ESCAMILLA, aka Dies, JESUS QUINONES MARQUEZ, aka Rinon, JOSE ANTONIO ORTEGA NUNO, EDGAR LOPEZ DE-ANDA DAHER, aka Pollito, JOSE ALEJANDRO FLORES MEZA, aka Shakira, ALICIA MARTINEZ, aka Comadre, JUAN CARLOS MAGANA HEREDIA, OSCAR DANIEL MONTOYA MORA, JORGE ALBERTO RAMIREZ PONCE, aka Betote, MIKAEL DANIEL BLASER, aka Troubles, JONATHAN VALLE, aka Reaper, ARMANDO CASTILLO, aka Choco, OMAR MARTINEZ, aka Nino, ENRIQUE SALINAS, JR., aka Playboy, RAUL MORENO, aka Flaco, MIGUEL SORIA, aka Mikey, PERLA YADIRA FLORES, aka P, LUZ MARIA BENAVIDEZ MARTINEZ, aka Araceli, BRIDGETTE REYNOSO, aka B, JORGE HUMBERTO LORA, aka Georgie, CHRISTOPHER ADRIAN RUIZ, aka Sneaky, RICHARD GILBERT FAVELA, aka Tiny, HUMBERTO TORRES MENDOZA, aka Tito, JUAN CARLOS RIQUE AGUIRRE, aka JC, TELLIE KRESCHMER, HECTOR MONTES, aka Toxic, aka Little Spikey, JOSE CONTRERAS, aka Pepe, aka Dandi, HASSAIN ALZUBAIDY, aka Arab, OMAR MORA, ULISES VALENZUELA, BENJAMIN AVENDANO, aka Peso, JENNIFER ESCAMILLA, ARACELI VARELA, aka Uvia, ROCIO LOPEZ, KEVIN LUIS, aka Listo (collectively "Defendants"), and others known and unknown to the grand jury, were members and associates of an organization known as the "Fernando Sanchez Organization" ("FSO"), whose members engaged in, among other things, murder, conspiracy to commit murder, attempted murder,

1 kidnaping, conspiracy to kidnap, attempted kidnaping robbery,
2 conspiracy to commit robbery, attempted robbery, importation of
3 controlled substances into the United States from Mexico, conspiracy
4 to import controlled substances into the United States from Mexico,
5 distribution of controlled substances, conspiracy to distribute
6 controlled substances, money laundering and conspiracy to launder
7 money. At all relevant times, this organization operated in the
8 Southern District of California and elsewhere. The organization and
9 the individuals who associate with it for criminal purposes constitute
10 an "Enterprise," as defined by Title 18, United States Code,
11 Section 1961(4) (hereinafter the "Enterprise"), that is, a group of
12 individuals associated in fact. The Enterprise constituted an ongoing
13 organization whose members functioned as a continuing unit for the
14 common purpose of achieving the objectives of the Enterprise. The
15 Enterprise was engaged in, and its activities affected, interstate and
16 foreign commerce.

17 THE PURPOSE OF THE ENTERPRISE

18 2. The purposes of the Enterprise included, but are not limited
19 to, the following:

20 a. Enriching the members of Enterprise through, among
21 other things, the importation and distribution of illegal narcotics
22 in the United States, committing robberies, the kidnaping of
23 individuals in the United States and Mexico, and "taxing" individuals
24 involved in criminal activities within the geographical areas
25 controlled by the Enterprise, to include Tijuana, Mexico, and areas
26 of San Diego, California;

27 b. Keeping rival traffickers, potential informants,
28 witnesses against the Enterprise, law enforcement, the media, and the

1 public-at-large in fear of the Enterprise, and in fear of its members
2 and associates through threats of violence and violence;

3 c. Preserving, protecting and expanding the power of the
4 Enterprise through the use of intimidation, violence, threats of
5 violence, assaults and murders;

6 d. Preserving the continuity of membership in the
7 Enterprise by threatening members, associates and individuals with
8 knowledge of the Enterprise's illegal activities wishing to leave the
9 Enterprise with violence, assault and murder; and

10 e. Preserving the ongoing viability of the Enterprise by
11 assaulting law enforcement officers attempting to arrest Enterprise
12 members, bribing public officials to secure the release of arrested
13 Enterprise members and making payments to public officials in order
14 to gain access to confidential law enforcement information adverse to
15 the interests of the Enterprise.

16
17 **THE EVOLUTION AND STRUCTURE OF THE ENTERPRISE**
AND THE ROLES OF THE DEFENDANTS WITHIN THE ENTERPRISE

18 3. The Fernando Sanchez Organization evolved from the
19 now-defunct drug trafficking organization commonly known as the
20 Arellano-Felix drug trafficking organization, or "AFO." The AFO was
21 historically one of the most prolific and powerful drug trafficking
22 organizations in existence. When law enforcement officers in Mexico
23 arrested Javier Arellano-Felix and his primary lieutenant, Arturo
24 Villareal Heredia, aka Nalgon, in August 2006, the power void was
25 filled by two individuals: Eduardo Arellano-Felix (a brother of
26 Javier, Benjamin and Ramon Arellano-Felix) and Fernando Sanchez
27 Arellano, aka Ingeniero (a nephew of the Arellano-Felix brothers).

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1 After Eduardo Arellano-Felix was arrested by Mexican authorities on
2 October 25, 2008, Fernando Sanchez Arellano assumed full control over
3 the remnants of the FSO, which organization then transitioned to the
4 FSO.

5 4. At various times material to this Indictment, the defendants
6 had the following roles in the Enterprise.

7 a. Lieutenants: Defendants ARMANDO VILLAREAL HEREDIA,
8 aka Gordo, aka Gordo Villareal, RUBEN DARIO CASTRO PEREZ,
9 aka Compadre, aka Choques, and IVAN CANDELARIO MAGANA HEREDIA,
10 aka Soldado, occupied the position of lieutenants within the FSO. As
11 lieutenants, the defendants answered directly to Fernando Sanchez
12 Arellano and were responsible for directing, approving and managing
13 the criminal activities of the Enterprise. Although required to keep
14 Fernando Sanchez Arellano apprised of their decisions, the lieutenants
15 had the ability to sanction all types of criminal activities conducted
16 by Enterprise members, including, murder, kidnaping, drug trafficking
17 and money laundering-related offenses.

18 b. Underbosses: Defendants JOSE ALFREDO NAJERA GIL,
19 CARLOS COSME, MARIO ESCAMILLA, aka Unico, IGNACIO ESCAMILLA ESTRADA,
20 aka Uno, aka Senor, FAUSTO ESCAMILLA ESTRADA, aka Taliban, and EDGAR
21 GUSTAVO ESCAMILLA, aka Dies held the position of underbosses within
22 the FSO. In that capacity, the defendants had management and
23 oversight responsibility for the crew leaders' implementation of the
24 day-to-day criminal activities of the Enterprise.

25 c. Corrupt Foreign Law Enforcement Officials: Defendants
26 JESUS QUINONES MARQUEZ, aka Rinon, JOSE ANTONIO ORTEGA NUNO, EDGAR
27 LOPEZ DE-ANDA DAHER, aka Pollito, JOSE ALEJANDRO FLORES MEZA,
28 aka Shakira were either former or current law enforcement officers

1 working for the FSO. The defendants used their positions within the
2 Mexican law enforcement community to obtain and disseminate
3 confidential law enforcement information to the FSO, target rivals of
4 the FSO for arrest, obtain confessions from rival organization members
5 to gain intelligence about those organizations, bribe judicial and law
6 enforcement authorities to secure the release of arrested FSO members,
7 to shift responsibility for violent activities from the FSO to rival
8 organizations (both legally and in stories generated by the media),
9 and to obtain law enforcement employee information for the FSO's use
10 in targeting law enforcement officers taking actions adverse to the
11 interests of the Enterprise.

12 d. Crew Leaders: Defendants ALICIA MARTINEZ, aka Comadre,
13 JUAN CARLOS MAGANA HEREDIA, JORGE ALBERTO RAMIREZ PONCE, aka Betote,
14 and OMAR MARTINEZ, aka Nino held the position of crew leaders in the
15 FSO. In that role, the defendants implemented and supervised the
16 day-to-day criminal activities of the Enterprise, as directed by the
17 various underbosses.

18 e. Crew Members: Defendants OSCAR DANIEL MONTOYA MORA,
19 MIKAEL DANIEL BLASER, aka Troubles, JONATHAN VALLE, aka Reaper,
20 ARMANDO CASTILLO, aka Choco, ENRIQUE SALINAS, JR., aka Playboy, RAUL
21 MORENO, aka Flaco, MIGUEL SORIA, aka Mikey, PERLA YADIRA FLORES,
22 aka P, LUZ MARIA BENAVIDEZ MARTINEZ, aka Araceli, BRIDGETTE REYNOSO,
23 aka B, JORGE HUMBERTO LORA, aka Georgie, CHRISTOPHER ADRIAN RUIZ,
24 aka Sneaky, RICHARD GILBERT FAVELA, aka Tiny, HUMBERTO TORRES MENDOZA,
25 aka Tito, JUAN CARLOS RIQUE AGUIRRE, aka JC, TELLIE KRESCHMER, HECTOR
26 MONTES, aka Toxic, aka Little Spikey, JOSE CONTRERAS, aka Pepe,
27 aka Dandi, HASSAIN ALZUBAIDY, aka Arab, OMAR MORA, ULISES VALENZUELA,
28 BENJAMIN AVENDANO, aka Peso, JENNIFER ESCAMILLA, ARACELI VARELA,

1 aka Uvia, ROCIO LOPEZ, and KEVIN LUIS, aka Listo held the role of crew
2 members within the FSO. In that capacity, the defendants conducted
3 the day-to-day criminal activities of the Enterprise as directed by
4 the crew leaders and underbosses.

5 THE MEANS AND METHODS OF THE ENTERPRISE

6 5. Defendants and their coconspirators and associates used the
7 following methods and means, among others, to conduct and participate
8 in the conduct of the affairs of the Enterprise:

9 a. Higher level members of the FSO utilized the
10 multi-tiered organizational structure, including the use of "crew
11 leaders," to insulate themselves from prosecution by distancing
12 themselves from the day-to-day commission of illegal activities;

13 b. Leaders of the FSO used various cells working for the
14 FSO to commit criminal activities, such that if any one cell and its
15 members were arrested, those individuals would be unable to provide
16 significant details about the overall operation of the FSO;

17 c. Lieutenants of the FSO used individuals, referred to
18 as "aliniadors," to communicate with other members of the FSO on their
19 behalf in an effort to insulate themselves from law enforcement
20 scrutiny;

21 d. Defendants, along with other members of the Enterprise,
22 used multiple and changing "stash houses" to compartmentalize the
23 storage of money, narcotics and weapons, such that if law enforcement
24 learned of and searched any one "stash house," only a portion of the
25 FSO assets would be seized;

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1 e. When transporting individuals to FSO "stash houses,"
2 the operators of those locations would require the individuals
3 traveling with them to position themselves such that they would be
4 unable to view the route to, and the area surrounding, the "stash
5 house;"

6 f. Defendants, along with other members of the Enterprise,
7 made specific and detailed plans, including the extensive use of
8 surveillance, compartmentalized teams with specific tasks, and the
9 limited use of firepower, when committing, and attempting to commit,
10 murders and kidnappings;

11 g. Defendants, along with other members of the Enterprise,
12 deployed individuals to act as post-homicide lookouts, who reported
13 back to the FSO underboss responsible for overseeing the killings;

14 h. Members of the FSO who were either subjected to
15 retaliatory violent acts from rival organizations or law enforcement
16 scrutiny in Mexico, relocated from Tijuana, Mexico, to San Diego,
17 California, where they continued to direct illegal activities on
18 behalf of the FSO;

19 i. Defendants, along with other members of the Enterprise,
20 routinely used multiple and changing telephone facilities to
21 communicate regarding their illegal activities in an effort to thwart
22 law enforcement electronic surveillance efforts;

23 j. Defendants, along with other members of the Enterprise,
24 routinely used code words and coded communications when discussing the
25 illegal activities of the FSO;

26 k. Members and associates of the FSO targeted law
27 enforcement officers for recruitment into the FSO;

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1 l. Defendants, along with other members of the Enterprise,
2 obtained significant quantities of narcotics in Mexico, which FSO
3 members and associates imported into the United States for
4 distribution;

5 m. Defendants, along with other members of the Enterprise,
6 arranged to have the proceeds generated from drug sales in the United
7 States transported from the United States to Mexico;

8 n. Defendants, along with other members of the Enterprise,
9 purchased and sold firearms to generate income for the FSO and to arm
10 members and associates of the FSO for the commission of violent acts;
11 and

12 o. Defendants, along with other members of the Enterprise,
13 committed robberies in Mexico and the United States to generate income
14 for the FSO.

15 THE RACKETEERING CONSPIRACY

16 6. Beginning in or about November 2008, and continuing up to
17 and including July 22, 2010, within the Southern District of
18 California and elsewhere, defendants ARMANDO VILLAREAL HEREDIA,
19 aka Gordo, aka Gordo Villareal, RUBEN DARIO CASTRO PEREZ,
20 aka Compadre, aka Choques, IVAN CANDELARIO MAGANA HEREDIA,
21 aka Soldado, JOSE ALFREDO NAJERA GIL, CARLOS COSME, MARIO ESCAMILLA,
22 aka Unico, IGNACIO ESCAMILLA ESTRADA, aka Uno, aka Senor, FAUSTO
23 ESCAMILLA ESTRADA, aka Taliban, EDGAR GUSTAVO ESCAMILLA, aka Dies,
24 JESUS QUINONES MARQUEZ, aka Rinon, JOSE ANTONIO ORTEGA NUNO, EDGAR
25 LOPEZ DE-ANDA DAHER, aka Pollito, JOSE ALEJANDRO FLORES MEZA,
26 aka Shakira, ALICIA MARTINEZ, aka Comadre, JUAN CARLOS MAGANA HEREDIA,
27 OSCAR DANIEL MONTOYA MORA, JORGE ALBERTO RAMIREZ PONCE, aka Betote,
28 MIKAEL DANIEL BLASER, aka Troubles, JONATHAN VALLE, aka Reaper,

1 ARMANDO CASTILLO, aka Choco, OMAR MARTINEZ, aka Nino, ENRIQUE SALINAS,
2 JR., aka Playboy, RAUL MORENO, aka Flaco, MIGUEL SORIA, aka Mikey,
3 PERLA YADIRA FLORES, aka P, LUZ MARIA BENAVIDEZ MARTINEZ, aka Araceli,
4 BRIDGETTE REYNOSO, aka B, JORGE HUMBERTO LORA, aka Georgie,
5 CHRISTOPHER ADRIAN RUIZ, aka Sneaky, RICHARD GILBERT FAVELA, aka Tiny,
6 HUMBERTO TORRES MENDOZA, aka Tito, JUAN CARLOS RIQUE AGUIRRE, aka JC,
7 TELLIE KRESCHMER, HECTOR MONTES, aka Toxic, aka Little Spikey, JOSE
8 CONTRERAS, aka Pepe, aka Dandi, HASSAIN ALZUBAIDY, aka Arab, OMAR
9 MORA, ULISES VALENZUELA, BENJAMIN AVENDANO, aka Peso, JENNIFER
10 ESCAMILLA, ARACELI VARELA, aka Uvia, ROCIO LOPEZ, KEVIN LUIS,
11 aka Listo, and others known and unknown to the grand jury, being
12 persons employed by and associated with the Enterprise (as described
13 above), which Enterprise was engaged in, and the activities of which
14 affected interstate and foreign commerce, did knowingly and
15 intentionally conspire with each other, and with other persons, to
16 violate Title 18, United States Code, Section 1962(c), that is, to
17 conduct and participate, directly and indirectly, in the conduct of
18 the Enterprise's affairs through a pattern of racketeering activity
19 involving multiple acts indictable under State law and punishable by
20 imprisonment for more than one year and the following provisions of
21 federal law:

- 22 a. California Penal Code, Sections 31 and 187(a)
23 (murder and aiding and abetting murder);
- 24 b. California Penal Code, Sections 182 and 187(a)
25 (conspiracy to commit murder);
- 26 c. California Penal Code, Sections 664 and
27 187(a) (attempted murder);

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- 1 d. California Penal Code, Sections 31 and
- 2 207(a) (kidnaping and aiding and abetting
- 3 kidnaping);
- 4 e. California Penal Code, Sections 182 and 207(a)
- 5 (conspiracy to kidnap);
- 6 f. California Penal Code, Sections 664 and
- 7 207(a) (attempted kidnaping);
- 8 g. California Penal Code, Section 211 (robbery);
- 9 h. California Penal Code, Sections 182 and 211
- 10 (conspiracy to commit robbery);
- 11 i. California Penal Code, Sections 664 and 211
- 12 (attempted robbery);
- 13 j. Title 21, United States Code, Sections 952 and
- 14 960 (importation of a controlled substances);
- 15 k. Title 21, United States Code, Sections 952, 960
- 16 and 963 (conspiracy to import controlled
- 17 substances);
- 18 l. Title 21, United States Code, Section 841(a) (1)
- 19 (distribution of controlled substances);
- 20 m. Title 21, United States Code, Sections 846 and
- 21 841(a) (1) (conspiracy to distribute controlled
- 22 substances);
- 23 n. Title 18, United States Code, Section 1957 (money
- 24 laundering); and
- 25 o. Title 18, United States Code, Sections 1956(h)
- 26 and 1957 (conspiracy to launder money).

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1 7. It was a further part of the conspiracy that each defendant
2 agreed that a conspirator would commit at least two acts of
3 racketeering activity in the conduct of the affairs of the Enterprise.

4 OVERT ACTS

5 8. In furtherance of the conspiracy and to accomplish the
6 objects of the conspiracy, the defendants and their coconspirators
7 committed the following overt acts, among others, in San Diego County,
8 within the Southern District of California, unless otherwise
9 specified, on or about the dates set forth below:

10 (1) On or about February 4, 2009, defendant MARIO
11 ESCAMILLA stated that he had developed "more
12 connections," "power" and that he had made
13 "plans."

14 (2) On or about July 15, 2009, defendant BENJAMIN
15 AVENDANO stated that he was working for defendant
16 FAUSTO ESCAMILLA ESTRADA and other individuals
17 engaged in smuggling narcotics and committing
18 violent activities.

19 (3) On or about July 15, 2009, defendant BENJAMIN
20 AVENDANO stated that he would have to check on
21 the background of a person ("CI") in both Mexico
22 and the United States, to ensure that the CI was
23 not cooperating with law enforcement authorities,
24 before defendant BENJAMIN AVENDANO would engage
25 in criminal activities with the CI.

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1 (4) On or about August 31, 2009, defendant BENJAMIN
2 AVENDANO drove a 2004 Dodge Durango bearing
3 California license number 6HLU405 (Durango)
4 containing approximately 396 pounds of marijuana
5 southbound on Interstate 805 in San Diego,
6 California.

7 (5) On or about August 31, 2009, defendant MARIO
8 ESCAMILLA drove a 2007 Cadillac Escalade bearing
9 California license number 6DTF679 (Escalade),
10 which was equipped with a hard-wired police-type
11 siren, southbound on Interstate 805 in San Diego,
12 California.

13 (6) On or about August 31, 2009, defendant MARIO
14 ESCAMILLA, with defendants HECTOR MONTES and OMAR
15 MARTINEZ as passengers, attempted to use the
16 Escalade to ram into the patrol vehicle of a
17 California Highway Patrol Officer, who was
18 attempting to conduct a traffic stop of the
19 Durango containing approximately 396 pounds of
20 marijuana.

21 (7) On or about November 18, 2009, defendant MARIO
22 ESCAMILLA stated that he and his associates were
23 engaged in a transaction involving one ton of
24 marijuana.

25 (8) On or about November 18, 2009, defendant HECTOR
26 MONTES possessed a loaded Ruger 9mm handgun
27 bearing serial number 31614813.

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1 (9) On or about December 4, 2009, defendant MARIO
2 ESCAMILLA stated that he was working as an
3 enforcer for a drug trafficking organization
4 based in Tijuana, Mexico, and it was therefore
5 his responsibility to kill members of rival drug
6 trafficking organizations, such as the one headed
7 by Eduardo Garcia-Simental, aka "El Teo" (charged
8 elsewhere).

9 (10) On or about December 10, 2009, defendants MARIO
10 ESCAMILLA, OMAR MARTINEZ, ARMANDO CASTILLO and
11 CI-1 purchased three handguns from defendant JOSE
12 CONTRERAS, which were to be used in a "job," that
13 is, a murder, the "next day."

14 (11) On or about December 11, 2009, at the direction
15 of defendant MARIO ESCAMILLA, defendants RAUL
16 MORENO, ARMANDO CASTILLO, and ENRIQUE SALINAS
17 JR., traveled from San Diego, California, to
18 Tijuana, Mexico, to kill an unidentified
19 individual.

20 (12) On or about December 14, 2009, at the direction
21 of defendants MARIO ESCAMILLA and OMAR MARTINEZ,
22 defendants MIGUEL SORIA, RAUL MORENO and ARMANDO
23 CASTILLO, armed with a handgun, traveled to the
24 Plaza Las Americas shopping mall to commit the
25 robbery of approximately \$7,000 from two females
26 making a deposit at a bank.

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1 (13) On or about December 14, 2009, at the direction
2 of defendant MARIO ESCAMILLA, defendant RAUL
3 MORENO, armed with a handgun, drove to National
4 City, California, to locate and kill V.A.,
5 aka Chimbombis.

6 (14) On or about December 17, 2009, defendant MARIO
7 ESCAMILLA informed defendant JUAN CARLOS RIQUE
8 AGUIRRE that ESCAMILLA had found a "huge visa,"
9 that is, a method or means to smuggle three tons
10 of marijuana into the United States from Mexico.

11 (15) On or about December 17, 2009, defendant MARIO
12 ESCAMILLA and BRIDGETTE REYNOSO met with two
13 individuals at a restaurant in Chula Vista,
14 California, and negotiated for the importation
15 and delivery of a three ton quantity of
16 marijuana.

17 (16) On or about December 18, 2009, defendant ARMANDO
18 CASTILLO informed defendants MARIO ESCAMILLA and
19 HASSAIN ALZUBAIDY that CASTILLO had noticed law
20 enforcement surveillance units while making a
21 narcotics delivery earlier that day.

22 (17) On or about December 18, 2009, defendants
23 ARMANDO CASTILLO and MIGUEL SORIA possessed
24 approximately 2.4 grams of actual
25 methamphetamine.

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1 (18) On or about December 19, 2009, defendant JUAN
2 CARLOS RIQUE AGUIRRE provided defendant MARIO
3 ESCAMILLA with the location of C.H. so that
4 defendant MARIO ESCAMILLA could have C.H. killed.

5 (19) On or about December 19, 2009, defendant OMAR
6 MARTINEZ placed a telephone call to defendant
7 MARIO ESCAMILLA and stated that he was with "C"
8 (defendant Armando Castillo), "F" (defendant Raul
9 Moreno) and "Saadam Husein" (defendant Hassain
10 Alzubaidy) and that they were ready to find and
11 kill C.H. and C.H.'s father, and that they were
12 just waiting for Escamilla to "give the green
13 light."

14 (20) On or about December 19, 2009, at the direction
15 of defendants MARIO ESCAMILLA, HASSAIN ALZUBAIDY,
16 OMAR MARTINEZ, ARMANDO CASTILLO and RAUL MORENO
17 drove to various locations in San Diego for the
18 purpose of locating and killing C.H. and V.A.,
19 aka Chimbombis.

20 (21) On or about December 21, 2009, defendants MARIO
21 ESCAMILLA, RAUL MORENO, ENRIQUE SALINAS JR., OMAR
22 MARTINEZ, TELLIE KRESCHMER and MIKAEL DANIEL
23 BLASER possessed approximately 176 pounds of
24 marijuana, 1 pound of methamphetamine, 5 to 6
25 grams of cocaine, an AK-47 assault rifle, a
26 shotgun and a .38 caliber handgun.

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- 1 (22) On or about December 21, 2009, defendants MARIO
2 ESCAMILLA, RAUL MORENO, ENRIQUE SALINAS JR., OMAR
3 MARTINEZ, TELLIE KRESCHMER and MIKAEL DANIEL
4 BLASER discussed killing C.H., V.A. and A.M.
- 5 (23) On or about December 21, 2009, after receiving
6 permission from defendant MARIO ESCAMILLA,
7 defendant OMAR MARTINEZ and defendant ARMANDO
8 CASTILLO, armed with a loaded AK-47 assault
9 rifle, traveled to a location in the Shelltown
10 area of San Diego for the purpose of killing an
11 unidentified gang member.
- 12 (24) On or about December 23, 2009, defendant MARIO
13 ESCAMILLA arranged to have approximately
14 120 pounds of marijuana imported into the United
15 States from Mexico via the Otay Mesa Port of
16 Entry.
- 17 (25) On or about December 23, 2009, defendants MARIO
18 ESCAMILLA and RAUL MORENO possessed approximately
19 120 pounds of marijuana.
- 20 (26) On or about December 27, 2009, defendant JONATHAN
21 VALLE stated that he wanted to begin working for
22 defendant MARIO ESCAMILLA selling narcotics and
23 committing violent crimes.
- 24 (27) On or about December 27, 2009, defendant MARIO
25 ESCAMILLA told defendant JONATHAN VALLE that
26 "Panda" and "the bus driver" needed to be "taken
27 out," that is, those individuals needed to be
28 killed.

- 1 (28) On or about December 27, 2009, defendants MARIO
2 ESCAMILLA and MIKAEL DANIEL BLASER "fronted" a
3 half-ounce of methamphetamine to Jonathan Valle.
4 (29) On or about December 28, 2009, defendant OMAR
5 MARTINEZ delivered approximately a half-kilogram
6 of cocaine to defendant JUAN CARLOS RIQUE
7 AGUIRRE.
8 (30) On or about December 31, 2009, within the Central
9 District of California, defendant HUMBERTO TORRES
10 MENDOZA possessed approximately three pounds of
11 methamphetamine.
12 (31) On January 6, 2010, defendant RAUL MORENO
13 arranged for Jorge Loza Jr. (charged elsewhere)
14 to sell an individual cooperating with the
15 Government ("CI-1") an AK-47 assault rifle for
16 \$1,500.
17 (32) On or about January 7, 2010, defendants OMAR
18 MARTINEZ and JONATHAN VALLE entered into an
19 agreement to kill A.E.Z.
20 (33) On or about January 7, 2010, defendants OMAR
21 MARTINEZ and JONATHAN VALLE possessed a loaded
22 Ruger 9mm pistol bearing serial number 30172546.
23 (34) On or about January 8, 2010, defendant OMAR
24 MARTINEZ possessed a loaded Ruger 9mm pistol
25 bearing serial number 30172546.

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1 (35) On or about January 8, 2010, defendants JONATHAN
2 VALLE, ARMANDO CASTILLO, MIGUEL SORIA and RAUL
3 MORENO entered into an agreement to kill A.E.Z.
4 (36) On or about January 8, 2010, defendants JONATHAN
5 VALLE, ARMANDO CASTILLO, MIGUEL SORIA and RAUL
6 MORENO possessed a loaded Ruger 9mm pistol
7 bearing serial number 30172546 and 38 rounds of
8 9mm pistol ammunition.
9 (37) On or about January 8, 2010, defendants MARIO
10 ESCAMILLA, ARMANDO VILLAREAL HEREDIA, PERLA
11 YADIRA FLORES, LUZ MARTINEZ, MIKAEL DANIEL BLASER
12 and BRIDGETTE REYNOSO entered into an agreement
13 to kill A.E.Z.
14 (38) On or about January 8, 2010, defendants PERLA
15 YADIRA FLORES and LUZ MARTINEZ lured A.E.Z. to a
16 hotel room in National City, California.
17 (39) On or about January 9, 2010, defendant MARIO
18 ESCAMILLA told defendant MIKAEL DANIEL BLASER
19 that if defendant MIKAEL DANIEL BLASER committed
20 the murder of Zavala, defendant MIKAEL DANIEL
21 BLASER would be respected by the "clika of the
22 senores," that is, the leaders of the Enterprise
23 in Mexico.
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- 1 (40) On or about January 9, 2010, defendants MARIO
2 ESCAMILLA, BRIDGETTE REYNOSO and MIKAEL DANIEL
3 BLASER waited in the area adjacent to a hotel
4 located in National City, California, for the
5 purpose of shooting and killing A.E.Z. when he
6 left the hotel.
- 7 (41) On or about January 9, 2010, defendant MARIO
8 ESCAMILLA stated that he would use his vehicle to
9 "block" any police cars that gave chase to
10 defendant MIKAEL DANIEL BLASER'S vehicle
11 following the murder of A.E.Z.
- 12 (42) On or about January 11, 2010, defendant MARIO
13 ESCAMILLA expressed disappointment over the fact
14 that Raul Moreno had been "rolling a joint" in
15 the middle of "doing a mission," that is,
16 attempting to locate and kill A.E.Z.
- 17 (43) On or about January 22, 2010, defendant MARIO
18 ESCAMILLA agreed to sell CI-1 a half-pound of
19 methamphetamine for \$6,000.
- 20 (44) On or about January 23, 2010, defendant MARIO
21 ESCAMILLA instructed defendants RAUL MORENO and
22 MIKAEL DANIEL BLASER to kill A.E.Z. "using the
23 pants," that is, using long guns.
- 24 (45) On or about January 23, 2010, defendant MIGUEL
25 SORIA possessed approximately 150 pounds of
26 marijuana.

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1 (46) On or about January 26, 2010, at the direction of
2 defendants MARIO ESCAMILLA, BRIDGETTE REYNOSO and
3 MIKAEL DANIEL BLASER sold CI-1 a half-pound of
4 methamphetamine (212 grams of actual
5 methamphetamine) for \$6,500.

6 (47) On or about February 3, 2010, defendant MARIO
7 ESCAMILLA made arrangements with defendant
8 IGNACIO ESCAMILLA ESTRADA to have two females -
9 defendant TELLIE KRESCHMER and a juvenile -
10 body-cavity smuggle a half-pound of
11 methamphetamine into the United States from
12 Mexico.

13 (48) On or about February 3, 2010, defendant MARIO
14 ESCAMILLA instructed defendant PERLA YADIRA
15 FLORES to give defendant BRIDGETTE REYNOSO
16 \$5,500, which defendant BRIDGETTE REYNOSO then
17 transported from San Diego to Tijuana, Mexico.

18 (49) On or about February 3, 2010, in Tijuana, Mexico,
19 defendant BRIDGETTE REYNOSO paid defendant
20 IGNACIO ESCAMILLA ESTRADA \$5,500 for a half-pound
21 of methamphetamine.

22 (50) On or about February 3, 2010, defendant TELLIE
23 KRESCHMER and a juvenile female smuggled a total
24 of a half-pound of methamphetamine into the
25 United States from Mexico via the San Ysidro Port
26 of Entry.

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1 (51) On or about February 3, 2010, defendant RAUL
2 MORENO placed a call to CI-1 and asked if "the
3 girls" were "back safely."

4 (52) On or about February 3, 2010, the two female
5 couriers employed by defendants MARIO ESCAMILLA
6 and IGNACIO ESCAMILLA ESTRADA provided CI-1 with
7 the half-pound of methamphetamine (166 grams of
8 actual methamphetamine) they had just smuggled
9 into the United States from Mexico.

10 (53) On or about February 3, 2010, defendant CARLOS
11 COSME stated that he had someone who could "run
12 names," that is, run queries in law enforcement
13 data bases, at the "port of entry."

14 (54) On or about February 9, 2010, defendant CARLOS
15 COSME agreed to sell an individual cooperating
16 with the Government (CI-3) two pounds of
17 methamphetamine in Tijuana, Mexico, for \$18,000.

18 (55) On or about February 10, 2010, defendant CARLOS
19 COSME informed CI-3 that he would have Mexican
20 State Judicial Agents deliver two pounds of
21 methamphetamine to CI-3's employees in Tijuana,
22 Mexico.

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1 (56) On or about February 10, 2010, at the direction
2 of defendant CARLOS COSME, Mexican State Judicial
3 Agents delivered approximately two pounds of
4 methamphetamine to defendant IGNACIO ESCAMILLA
5 ESTRADA, who was acting at the direction of
6 defendant ARMANDO VILLAREAL HEREDIA, in Tijuana,
7 Mexico.

8 (57) On or about February 10, 2010, defendants ARMANDO
9 VILLAREAL HEREDIA and IGNACIO ESCAMILLA ESTRADA
10 made arrangements to have two female couriers
11 body-cavity smuggle approximately two pounds of
12 methamphetamine into the United States from
13 Mexico via the San Ysidro Port of Entry.

14 (58) On or about February 10 and 11, 2010, at the
15 direction of defendant IGNACIO ESCAMILLA ESTRADA,
16 defendant TELLIE KRESCHMER and a juvenile female
17 body-cavity smuggled a total of approximately one
18 pound of methamphetamine into the United States
19 from Mexico via the San Ysidro Port of Entry.

20 (59) On or about February 11, 2010, defendant MIKAEL
21 DANIEL BLASER possessed approximately one pound
22 of methamphetamine and a firearm.

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1 (60) On or about February 11, 2010, at the direction
2 of defendant IGNACIO ESCAMILLA ESTRADA and
3 defendant MARIO ESCAMILLA, CI-1 delivered
4 approximately one pound of methamphetamine
5 (436 grams of actual methamphetamine) to a
6 vehicle parked near the intersection of Saturn
7 Boulevard and Coronado Avenue in San Diego.

8 (61) On or about February 11, 2010, defendant CARLOS
9 COSME picked up a \$9,000 cash payment for the one
10 pound of methamphetamine delivered earlier that
11 day by CI-1.

12 (62) On or about February 12, 2010, at the direction
13 of defendants IGNACIO ESCAMILLA ESTRADA, TELLIE
14 KRESCHMER, and a juvenile female attempted to
15 body-cavity smuggle approximately one pound of
16 methamphetamine into the United States from
17 Mexico via the San Ysidro Port of Entry.

18 (63) On or about February 12, 2010, defendant MIKAEL
19 DANIEL BLASER possessed approximately
20 three-quarters of a pound of methamphetamine and
21 a firearm.

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1 (64) On or about February 12, 2010, at the direction
2 of defendant MARIO ESCAMILLA, CI-1 delivered
3 approximately three-quarters of a pound of
4 methamphetamine (321 grams of actual
5 methamphetamine) to a vehicle parked near the
6 intersection of Saturn Boulevard and Coronado
7 Avenue in San Diego.

8 (65) On or about February 12, 2010, defendant CARLOS
9 COSME picked up a \$9,000 cash payment for the
10 three-quarters of a pound of methamphetamine
11 delivered earlier that day by CI-1.

12 (66) On or about February 16, 2010, defendant MARIO
13 ESCAMILLA provided CI-1 with the names of
14 individuals being targeted for assassination by
15 the Enterprise.

16 (67) On or about February 17, 2010, defendant RAUL
17 MORENO sold an SKS assault rifle to CI-1 for
18 \$1,000.

19 (68) On or about February 19, 2010, defendant ARMANDO
20 VILLAREAL HEREDIA gave CI-3 permission to conduct
21 criminal activities in the United States.

22 (69) On or about February 19, 2010, defendant ARMANDO
23 VILLAREAL HEREDIA tasked CI-3 with obtaining one
24 van and two cars for "the team," that is, a
25 kidnaping/murder crew operating in Tijuana,
26 Mexico.

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1 (70) On or about February 22, 2010, defendants PERLA
2 YADIRA FLORES, RAUL MORENO, JORGE HUMBERTO LORA
3 and MARIO ESCAMILLA possessed marijuana.

4 (71) On or about February 22, 2010, defendant MIKAEL
5 DANIEL BLASER possessed an eighth of an ounce of
6 cocaine, an AK-47 and a .38 caliber handgun.

7 (72) On or about February 23, 2010, defendants MARIO
8 ESCAMILLA, PERLA YADIRA FLORES and MIKAEL DANIEL
9 BLASER attempted to murder A.E.Z.

10 (73) On or about February 23, 2010, defendant MIKAEL
11 DANIEL BLASER possessed a handgun for the purpose
12 of murdering A.E.Z.

13 (74) On or about February 25, 2010, at the direction
14 of defendant ARMANDO VILLAREAL HEREDIA, defendant
15 MARIO ESCAMILLA purchased law enforcement
16 uniforms, boots, gloves, ski masks and plastic
17 restraint devices, also known as "zip ties."

18 (75) On or about February 26, 2010, defendant MARIO
19 ESCAMILLA sold CI-1 a sixteenth of an ounce of
20 cocaine for \$140.

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1 (76) On or about March 1, 2010, defendant MARIO
2 ESCAMILLA stated that because defendant RAUL
3 MORENO was too scared to participate in the
4 attempted murder of A.E.Z. on February 23, 2010,
5 defendant MARIO ESCAMILLA was considering sending
6 defendant MARIO MORENO on an "errand" to Tijuana,
7 Mexico, where defendant MARIO ESCAMILLA would
8 have his father, defendant IGNACIO ESCAMILLA
9 ESTRADA, kill defendant RAUL MORENO.

10 (77) On or about March 1, 2010, defendant MARIO
11 ESCAMILLA tasked CI-1 with obtaining "paperwork,"
12 that is, official law enforcement reports,
13 documenting the arrest of a juvenile female who
14 was caught attempting to body-cavity smuggle a
15 quarter-pound of methamphetamine into the United
16 States from Mexico via the San Ysidro Port of
17 Entry on February 12, 2010.

18 (78) On or about March 3, 2010, defendant MARIO
19 ESCAMILLA agreed to let defendant KEVIN LUIS
20 distribute narcotics on behalf of the Enterprise.

21 (79) On or about March 3, 2010, defendant MARIO
22 ESCAMILLA agreed to let defendant ARACELI VARELA
23 distribute narcotics on behalf of the Enterprise.

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1 (80) On or about March 3, 2010, defendant MARIO
2 ESCAMILLA instructed defendant FAUSTO ESCAMILLA
3 ESTRADA to speak with "the Senor," that is,
4 defendant Armando Villareal Heredia, regarding a
5 pending order for three pounds of
6 methamphetamine.

7 (81) On or about March 4, 2010, defendant MARIO
8 ESCAMILLA and defendant RAUL MORENO sold CI-1 an
9 AK-47 assault rifle for \$1,200.

10 (82) On or about March 6, 2010, defendants JOSE
11 ALFREDO NAJERA GIL and RUBEN DARIO CASTRO PEREZ
12 tasked "Jose" with coordinating the murder of
13 Efrain Alvarez Gonzalez and Abel Joatan Gonzalez
14 in Tijuana, Mexico.

15 (83) On or about March 8, 2010, defendant MARIO
16 ESCAMILLA stated that he was going to collect a
17 \$10,000 drug debt owed to him by defendant JUAN
18 CARLOS RIQUE AGUIRRE and that he would then kill
19 Aguirre.

20 (84) On or about March 8, 2010, defendant JOSE
21 CONTRERAS provided defendant MARIO ESCAMILLA with
22 two bullet proof vests and several thousand
23 dollars.

24 (85) On or about March 8, 2010, defendant JOSE
25 CONTRERAS asked defendant MARIO ESCAMILLA to
26 deliver several thousand dollars to defendant
27 EDGAR ESCAMILLA in Tijuana, Mexico.

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1 (86) On or about March 8, 2010, defendant MARIO
2 ESCAMILLA stated that defendant JOSE CONTRERAS
3 was "on the same crew as Dies," that is, that
4 defendant JOSE CONTRERAS worked for defendant
5 EDGAR ESCAMILLA.

6 (87) On or about March 9, 2010, defendants MARIO
7 ESCAMILLA and ENRIQUE SALINAS JR. discussed a
8 shipment of narcotics coming into the United
9 States from Mexico.

10 (88) On or about March 9, 2010, defendant KEVIN LUIS
11 picked up approximately five pounds of marijuana
12 from a "stash house" maintained by defendant
13 MIKAEL DANIEL BLASER.

14 (89) On or about March 11, 2010, defendants MARIO
15 ESCAMILLA and BRIDGETTE REYNOSO agreed to assault
16 a female in Santee, California, on behalf of
17 "Tochas" because the female had "disrespected the
18 Senores," that is, she failed to show appropriate
19 deference to one or more of the Enterprise
20 leaders in Tijuana, Mexico.

21 (90) On or about March 12, 2010, defendants MARIO
22 ESCAMILLA and ARACELI VARELA provided a sample of
23 methamphetamine to two individuals at a location
24 near Third Avenue and Naples Street in Chula
25 Vista, California.

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1 (91) On or about March 12, 2010, defendants MARIO
2 ESCAMILLA and IGNACIO ESCAMILLA ESTRADA agreed to
3 supply defendant defendant KEVIN LUIS with an
4 ounce of methamphetamine every week at a price of
5 \$775 per ounce, as long as Luis was willing to
6 pick the methamphetamine up in Tijuana, Mexico.

7 (92) On or about March 15, 2010, defendant JOSE
8 ALFREDO NAJERA GIL recruited CI-3 to kidnap and
9 collect a drug debt owed to the Enterprise by
10 M.L.

11 (93) On or about March 16, 2010, defendant ARMANDO
12 VILLAREAL HEREDIA offered to sell CI-3 three
13 pounds of methamphetamine at a price of \$10,500
14 per pound.

15 (94) On or about March 16, 2010, defendant ARMANDO
16 VILLAREAL HEREDIA offered to sell CI-3 four AK-47
17 assault rifles at a price of \$2,300 per gun and
18 four "5-7s," also known as "cop killers," at a
19 price of \$1,700 per gun.

20 (95) On or about March 16, 2010, defendant ARMANDO
21 VILLAREAL HEREDIA agree to sell CI-3 tactical law
22 enforcement uniforms at a price of \$250 per
23 uniform.

24 (96) On or about March 16, 2010, defendant JOSE
25 ALFREDO NAJERA GIL informed CI-3 that "Tito"
26 (defendant HUMBERTO TORRES MENDOZA) would assist
27 CI-3 with the kidnaping of M.L.

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1 (97) On or about March 16, 2010, defendant HUMBERTO
2 TORRES MENDOZA informed CI-3 that M.L. lived in
3 Van Nuys, California.

4 (98) On or about March 16, 2010, defendant MARIO
5 ESCAMILLA offered to sell an undercover law
6 enforcement officer one pound of methamphetamine
7 for \$14,000.

8 (99) On or about March 16, 2010, at the direction of
9 defendants MARIO ESCAMILLA, IGNACIO ESCAMILLA
10 ESTRADA, FAUSTO ESCAMILLA ESTRADA, MIKAEL DANIEL
11 BLASER and JORGE HUMBERTO LORA, traveled from San
12 Diego to Tijuana, Mexico, where defendant MIKAEL
13 DANIEL BLASER carjacked a blue 2008 Ford
14 Explorer.

15 (100) On or about March 16, 2010, in Tijuana, Mexico,
16 defendants MIKAEL DANIEL BLASER and JORGE
17 HUMBERTO LOYA attempted to rob \$50,000 from an
18 individual making a cash deposit at a check
19 cashing business.

20 (101) On or about March 16, 2010, defendant MARIO
21 ESCAMILLA assaulted M.R. in front of an apartment
22 complex located at 1030 15th Street, Imperial
23 Beach, California.

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1 (102) On or about March 16, 2010, defendant JOSE
2 ALFREDO NAJERA GIL told defendant JESUS QUINONES
3 MARQUEZ that he was going to get a new phone
4 number for Marquez's phone, but that despite that
5 change, Marquez would not lose his "agenda," that
6 is, his contact list.

7 (103) On or about March 17, 2010, defendant HUMBERTO
8 TORRES MENDOZA provided CI-3 and a law
9 enforcement officer acting in an undercover
10 capacity with M.L.'s photograph and a residence
11 address.

12 (104) On or about March 17, 2010, defendants MARIO
13 ESCAMILLA, PERLA YADIRA FLORES and JORGE HUMBERTO
14 LORA possessed approximately one pound of
15 methamphetamine.

16 (105) On or about March 18, 2010, defendant JORGE
17 HUMBERTO LORA sold CI-1 an SKS assault rifle with
18 an obliterated serial number for \$1,000.

19 (106) On or about March 17, 2010, defendant JESUS
20 QUINONES MARQUEZ provided defendant JOSE ALFREDO
21 NAJERA GIL with information about a triple
22 homicide which occurred in "Las Brisas," a
23 neighborhood in Tijuana, Mexico.

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1 (107) On or about March 18, 2010, defendants MARIO
2 ESCAMILLA, MIKAEL DANIEL BLASER and TELLIE
3 KRESCHMER possessed approximately 23 ounces of
4 methamphetamine (635 grams of actual
5 methamphetamine), approximately 30 pounds of
6 marijuana and a stolen shotgun.

7 (108) On or about March 19, 2010, defendants MARIO
8 ESCAMILLA and JORGE HUMBERTO LORA sold CI-1 an
9 FEG model PJK-9 HP 9 mm handgun and a IAI
10 semi-automatic .380 caliber handgun for \$700.

11 (109) On or about March 23, 2010, defendant CARLOS
12 COSME agreed to sell CI-3 two AR-15 assault
13 rifles at a price of between \$1,500 to \$2,000 for
14 each gun.

15 (110) On or about March 23, 2010, defendant JESUS
16 QUINONEZ MARQUEZ informed defendant JOSE ALFREDO
17 NAJERA GIL that he (MARQUEZ) was "waiting for
18 things to get better" so that NAJERA could buy
19 him (MARQUEZ) the apartment, to which NAJERA
20 responded that there would be "more money,"
21 "things would get better," and that MARQUEZ
22 should "not worry."

23 (111) On or about March 24, 2010, defendant ARMANDO
24 VILLAREAL HEREDIA brokered the sale of an AR-15
25 assault rifle and a "5-7," also known as a "cop
26 killer," to CI-3 and a law enforcement officer
27 acting in an undercover capacity.

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1 (112) On or about March 24, 2010, defendant MARIO
2 ESCAMILLA sold CI-1 a pound of methamphetamine
3 (380 grams of actual methamphetamine) for
4 \$14,000.

5 (113) On or about March 25, 2010, "Panchito" informed
6 defendant JOSE ALFREDO NAJERA GIL that he was "in
7 the fucking car and his eyes were not moving from
8 the fucking house so they (defendants EFRAIN
9 ALVAREZ GONZALEZ and ABEL JOATAN GONZALEZ) would
10 not be able to get by without being seen."

11 (114) On or about March 25, 2010, "Panchito" informed
12 defendant JOSE ALFREDO NAJERA GIL that they
13 (EFRAIN ALVAREZ GONZALEZ and ABEL JOATAN
14 GONZALEZ) had left the house in a "Silverado"
15 with "California plates" and that they were
16 heading up to the "El Florido" neighborhood in
17 Tijuana, Mexico.

18 (115) On or about March 25, 2010, defendant JOSE
19 ALFREDO NAJERA GIL informed defendant RUBEN DARIO
20 CASTRO PEREZ that he had "given the order" to
21 have EFRAIN ALVAREZ GONZALEZ and ABEL JOATAN
22 GONZALEZ murdered when they were "on their way to
23 El Florido."

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1 (116) On or about March 25, 2010, at the direction of
2 defendants JOSE ALFREDO NAJERA GIL and RUBEN
3 DARIO CASTRO PEREZ, "Panchito" and other
4 unidentified individuals shot and killed Efrain
5 Alvarez Gonzalez and Abel Joatan Gonzalez in the
6 El Florido neighborhood of Tijuana, Mexico.

7 (117) On or about March 25, 2010, defendant JOSE
8 ALFREDO NAJERA GIL informed defendant RUBEN DARIO
9 CASTRO PEREZ that "the vehicle was crashed" and
10 that "they sat both of them," that is, that both
11 Efrain Alvarez Gonzalez and Abel Joatan Gonzalez
12 had been murdered.

13 (118) On or about March 25, 2010, defendant JOSE
14 ALFREDO NAJERA GIL informed defendant OSCAR
15 DANIEL MONTOYA MORA that Efrain Alvarez Gonzalez
16 and Abel Joatan Gonzalez had been successfully
17 murdered, to which Montoya responded, "That's
18 good."

19 (119) On or about March 25, 2010, defendant RUBEN DARIO
20 CASTRO PEREZ instructed defendant JOSE ALFREDO
21 NAJERA GIL to have the men "pick up Reyna," that
22 is, to kidnap Efrain Alvarez Gonzalez's mother,
23 R.G.

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1 (120) On or about March 25, 2010, defendant RUBEN DARIO
2 CASTRO PEREZ instructed defendant JOSE ALFREDO
3 NAJERA GIL to contact defendant JESUS QUINONES
4 MARQUEZ and have MARQUEZ "spread the rumor and
5 make a mess of things, just as if 'they' (Efrain
6 Alvarez Gonzalez and Abel Joatan Gonzalez) were
7 bad guys."

8 (121) On or about March 25, 2010, "Panchito" informed
9 defendant JOSE ALFREDO NAJERA GIL that "it was
10 confirmed, they both got taken down," that is,
11 that both Efrain Alvarez Gonzalez and Abel Joatan
12 Gonzalez had been murdered.

13 (122) On or about March 25, 2010, defendant Oscar
14 Daniel Montoya Mora informed defendant JOSE
15 ALFREDO NAJERA GIL that he would make a \$5,000
16 payment to the individuals who participated in
17 the murder of Efrain Alvarez Gonzalez and Abel
18 Joatan Gonzalez.

19 (123) On or about March 25, 2010, "Gabby" used a
20 .38 caliber handgun to shoot and kill Marisol
21 Fuerte Aguinon at a location near Parque Morelos
22 in Tijuana, Mexico.

23 (124) On or about March 25, 2010, defendant JORGE
24 ALBERTO RAMIREZ PONCE informed defendant Jose
25 ALFREDO NAJERA GIL that "the lady" (Marisol
26 Fuerte Aguinon) had been located and "they cashed
27 her check," that is, Aguinon had been killed.

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1 (125) On or about March 25, 2010, Mario LNU instructed
2 CI-3 to kill M.L. if M.L. refused to pay the debt
3 he owed to the Enterprise.

4 (126) On or about March 27, 2010, defendant JESUS
5 QUINONES MARQUEZ informed defendant JOSE ALFREDO
6 NAJERA GIL that he (MARQUEZ) had been tasked by
7 defendant RUBEN DARIO CASTRO PEREZ with making
8 the murders of Efrain Alvarez Gonzalez and Abel
9 Joatan Gonzalez appear to have been committed by
10 members of a rival organization.

11 (127) On or about March 27, 2010, defendant JOSE
12 ALFREDO NAJERA GIL informed defendant JESUS
13 QUINONES MARQUEZ that he would check with
14 defendant RUBEN DARIO CASTRO PEREZ and confirm
15 that there would be "motivation," that is, a cash
16 payment, if Marquez made the murders of Efrain
17 Alvarez Gonzalez and Abel Joatan Gonzalez appear
18 to have been committed by members of a rival
19 organization.

20 (128) On or about March 31, 2010, at the direction of
21 defendant JOSE ALFREDO NAJERA GIL, and with the
22 assistance of Mario LNU and defendant HUMBERTO
23 TORRES MENDOZA, CI-3 and a team of undercover law
24 enforcement officers conducted a "staged"
25 kidnaping of M.L.

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1 (129) On or about March 31, 2010, defendant JOSE
2 ALFREDO NAJERA GIL informed defendant JORGE
3 ALBERTO RAMIREZ PONCE that M.L. had been kidnaped
4 and that PONCE needed to "take care of that
5 matter quick," to which PONCE responded, "a
6 vacation would be fine," that is, killing M.L.
7 was an option.

8 (130) On or about April 2, 2010, defendant JORGE
9 HUMBERTO LORA stated that he had recently
10 transported 839 pounds of marijuana from San
11 Diego to Los Angeles for defendant MARIO
12 ESCAMILLA and that ESCAMILLA had paid him \$2,000
13 for transporting the marijuana.

14 (131) On or about April 2, 2010, defendant MARIO
15 ESCAMILLA stated that he had taken a black
16 Mitsubishi from "Mangera" as collateral for a
17 \$2,500 drug debt owed by "Mangera."

18 (132) On or about April 6, 2010, defendant JORGE
19 HUMBERTO LORA stated that defendant MARIO
20 ESCAMILLA had used too much "cut," that is, a
21 dilutant, on a quarter pound of methamphetamine
22 that LORA had recently sold to a female who lived
23 near the Sycuan Indian Reservation in San Diego.

24 (133) On or about April 6, 2010, defendant MARIO
25 ESCAMILLA stated that he was expecting to receive
26 a 380 pound marijuana shipment.

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1 (134) On or about April 7, 2010, defendant JOSE ALFREDO
2 NAJERA GIL instructed CI-3 to take a \$10,000
3 ransom payment from M.L.'s family.

4 (135) On or about April 14, 2010, Grecia Granados
5 Brambilla (charged elsewhere) and Adriana
6 Espinoza Vasquez (charged elsewhere) picked up a
7 \$10,000 "ransom payment" from CI-3 and a law
8 enforcement officer acting in an undercover
9 capacity.

10 (136) On or about April 15, 2010, at the direction of
11 defendant JOSE ALFREDO NAJERA GIL, defendant
12 OSCAR DANIEL MONTOYA MORA delivered a \$4,000
13 payment to CI-3 and a law enforcement officer
14 acting in an undercover capacity.

15 (137) On or about April 15, 2010, defendant MARIO
16 ESCAMILLA sold CI-1 an SKS 7.62 mm rifle for
17 \$1,400.

18 (138) On or about April 15, 2010, defendant MARIO
19 ESCAMILLA sold CI-1 an SKS 7.62 mm rifle for
20 \$1,000.

21 (139) On or about April 17, 2010, within the Central
22 District of California, and at the direction of
23 defendant ARMANDO VILLAREAL HEREDIA, two Hispanic
24 males delivered a "5-7," also known as a "cop
25 killer," to a law enforcement officer who was
26 acting in an undercover capacity.

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1 (140) On or about April 19, 2010, defendant JOSE
2 ALFREDO NAJERA GIL informed CI-3 that defendant
3 OSCAR DANIEL MONTOYA MORA would introduce CI-3 to
4 an unidentified male ("UM"), so that CI-3 and the
5 UM could make arrangements to rob \$100,000 from
6 a check cashing business in National City,
7 California.

8 (141) On or about April 19, 2010, within the Central
9 District of California, and at the direction of
10 defendant ARMANDO VILLAREAL HEREDIA, an
11 unidentified Hispanic male delivered an AR-15
12 assault rifle to a law enforcement officer who
13 was acting in an undercover capacity.

14 (142) On or ABOUT APRIL 20, 2010, defendants MARIO
15 Escamilla and CHRISTOPHER ADRIAN RUIZ sold CI-1
16 a Colt AR-15 assault rifle for \$1,500.

17 (143) On or about April 23, 2010, defendant JOSE
18 ALFREDO NAJERA GIL offered to sell CI-3 an
19 unspecified quantity of methamphetamine at a
20 price of \$11,500 per pound.

21 (144) On or about April 24, 2010, in Tijuana, Mexico,
22 defendant JOSE ALEJANDRO FLORES MESA conducted
23 surveillance of C.A.P.

24 (145) On or about April 25, 2010, at the direction of
25 defendant RUBEN DARIO CASTRO PEREZ, defendant
26 JOSE ALFREDO NAJERA GIL, "Marcos," and several
27 other unidentified individuals kidnaped C.A.P. in
28 Tijuana, Mexico.

1 (146) On or about April 25, 2010, defendant RUBEN DARIO
2 CASTRO PEREZ instructed defendant JOSE ALFREDO
3 NAJERA GIL to have the person interrogating
4 C.A.P. ask the following questions: (1) What do
5 you do for a living? (2) What group do you belong
6 to? (3) Who is your boss? (4) Which kidnappings
7 have you participated in?

8 (147) On or about April 25, 2010, at the direction of
9 defendant JOSE ALFREDO NAJERA GIL, "Marcos"
10 interrogated C.A.P. about the location of other
11 individuals employed by the drug trafficking
12 organization controlled by Teodoro Garcia
13 Simental, aka "El Teo" (charged elsewhere).

14 (148) On or about April 25, 2010, defendant FAUSTO
15 ESCAMILLA ESTRADA informed defendant MARIO
16 ESCAMILLA that defendant ARMANDO VILLAREAL
17 HEREDIA had ordered the murder of an individual
18 in San Diego and that defendant FAUSTO ESCAMILLA
19 ESTRADA would be sending someone to meet with
20 defendant MARIO ESCAMILLA the next day to give
21 defendant MARIO ESCAMILLA "the coordinates of the
22 big mouth," that is, the location of the intended
23 victim.

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1 (149) On or about April 25, 2010, defendant IVAN
2 CANDELARIO MAGANA HEREDIA told defendant CARLOS
3 COSME that Bladimir Castro Ochoa (charged
4 elsewhere), who defendant CANDELARIO MAGANA
5 HEREDIA referred to as "one of my guys," had been
6 arrested.

7 (150) On or about April 25, 2010, defendant IVAN
8 CANDELARIO MAGANA HEREDIA tasked defendant CARLOS
9 COSME with making the necessary arrangements,
10 including making bribe payments, to have Bladimir
11 Castro Ochoa (charged elsewhere) released from
12 custody in Mexico.

13 (151) On or about April 26, 2010, defendant MARIO
14 ESCAMILLA informed defendant FAUSTO ESCAMILLA
15 ESTRADA that defendants MARIO ESCAMILLA, JORGE
16 HUMBERTO LORA and "Luis" had attempted to locate
17 and kill an unidentified individual in San Diego,
18 California.

19 (152) On or about April 27, 2010, at the direction of
20 defendant JOSE ALFREDO NAJERA GIL, defendant
21 OSCAR DANIEL MONTOYA MORA delivered a sample of
22 methamphetamine (0.41 grams of actual
23 methamphetamine) to CI-3 and a law enforcement
24 officer acting in an undercover capacity.

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1 (153) On or about April 27, 2010, defendant OSCAR
2 DANIEL MONTOYA MORA informed CI-3 that he was
3 making arrangements to rob a liquor store, which
4 doubled as a check cashing business, located in
5 National City, California, and that the robbery
6 would be assisted by two employees at the store.

7 (154) On or about April 28, 2010, at the direction of
8 defendant JOSE ALFREDO NAJERA GIL, defendant
9 OSCAR DANIEL MONTOYA MORA sold a half-pound of
10 methamphetamine (228 grams of actual
11 methamphetamine) to CI-3 and a law enforcement
12 officer acting in an undercover capacity for
13 \$5,700.

14 (155) On or about April 28, 2010, defendant EDGAR
15 GUSTAVO ESCAMILLA directed defendant JORGE
16 HUMBERTO LORA and CI-1 to collect money from
17 defendant Christopher Adrian Ruiz and "Ricky."

18 (156) On or about April 28, 2010, defendant JOSE
19 ANTONIO ORTEGA NUNO agreed to operate and
20 supervise a "hit squad" in Tijuana, Mexico,
21 operating under the direction of defendant CARLOS
22 COSME.

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1 (157) On or about April 28, 2010, defendant EDGAR
2 GUSTAVO ESCAMILLA offered to "front" CI-1 a one
3 ounce sample of methamphetamine and stated that
4 if CI-1's customers liked the quality of the
5 methamphetamine, defendant EDGAR GUSTAVO
6 ESCAMILLA would supply CI-1 with additional
7 quantities by having four females body-cavity
8 smuggle the methamphetamine into the United
9 States from Mexico.

10 (158) On or about April 28, 2010, defendant EDGAR
11 GUSTAVO ESCAMILLA stated that he would look into
12 obtaining at least one handgun for CI-1 to use
13 against any person who "acted stupid" so CI-1
14 could make that person "sit down," that is, so
15 CI-1 could kill that person.

16 (159) On or about April 29, 2010, defendant RUBEN DARIO
17 CASTRO PEREZ told defendant JOSE ALFREDO NAJERA
18 GIL that he wanted defendant JOSE ALFREDO NAJERA
19 to make a "movie," that is, a video-taped
20 execution, that included "intelligence"
21 information, which CASTRO stated would be "bad
22 ass."

23 (160) On or about April 29, 2010, defendant EDGAR
24 GUSTAVO ESCAMILLA instructed defendant
25 CHRISTOPHER ADRIAN RUIZ to sell methamphetamine
26 at a price of \$6,400 per half-pound.

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- 1 (161) On or about May 3, 2010, defendant CARLOS COSME
2 stated that he had moved Z.L.G.M., a law
3 enforcement officer in Tijuana, several times and
4 that it would be cheaper if FNU LNU, aka Eco,
5 would kill Z.L.G.M.
- 6 (162) On or about May 4, 2010, at the direction of
7 defendants EDGAR GUSTAVO ESCAMILLA and JOSE
8 CONTRERAS, an unidentified male sold CI-1 a 9mm
9 Glock 26 handgun for \$1,000.
- 10 (163) On or about May 5, 2010, defendant CHRISTOPHER
11 ADRIAN RUIZ possessed a scale, a bullet proof
12 vest and a shotgun.
- 13 (164) On or about May 6, 2010, at the direction of
14 defendant JOSE ALFREDO NAJERA GIL, defendant
15 OSCAR DANIEL MONTOYA MORA sold a half-pound of
16 methamphetamine to CI-3 and a law enforcement
17 officer acting in an undercover capacity for
18 \$5,800.
- 19 (165) On or about May 6, 2010, at the direction of
20 defendant JOSE ALFREDO NAJERA GIL, defendant
21 OSCAR DANIEL MONTOYA MORA "fronted" a half-pound
22 of methamphetamine to CI-3 and a law enforcement
23 officer acting in an undercover capacity.
- 24 (166) On or about May 8, 2010, defendant RUBEN DARIO
25 CASTRO PEREZ instructed defendant JOSE ALFREDO
26 NAJERA GIL to watch the video "ejecucion de
27 fulano de tal trabajador de la barbie."

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1 (167) On or about May 11, 2010, defendants CHRISTOPHER
2 ADRIAN RUIZ and RICHARD GILBERT FAVELA physically
3 restrained and robbed M.G.

4 (168) On or about May 12, 2010, defendant EDGAR GUSTAVO
5 ESCAMILLA instructed CI-1 to obtain a vehicle and
6 crash it into the vehicle of a potential witness
7 against defendant MARIO ESCAMILLA so that the
8 witness would not be able to drive to defendant
9 MARIO ESCAMILLA'S court proceedings.

10 (169) On or about May 12, 2010, at the direction of
11 defendants JOSE ALFREDO NAJERA GIL and RUBEN
12 DARIO CASTRO PEREZ, Cristian LNU, aka Elmer,
13 placed a dead dog and a threatening message,
14 stating that "the family is next," on the
15 gravesite of Efrain Alvarez Gonzalez and Abel
16 Joatan Gonzalez.

17 (170) On or about May 13, 2010, defendant EDGAR GUSTAVO
18 ESCAMILLA instructed CI-1 to collect money from
19 an individual in National City and to send that
20 money to defendant EDGAR ESCAMILLA so that
21 defendant EDGAR ESCAMILLA could make a payment to
22 the "Senores," that is the leadership of the
23 Enterprise.

24 (171) On or about May 13, 2010, defendant EDGAR GUSTAVO
25 ESCAMILLA instructed defendant JORGE HUMBERO LORA
26 and CI-1 to collect a \$1,850 debt defendant
27 CHRISTOPHER ADRIAN RUIZ owed to defendant EDGAR
28 GUSTAVO ESCAMILLA.

1 (172) On or about May 13, 2010, defendant CHRISTOPHER
2 ADRIAN RUIZ sold CI-1 a .300 caliber Savage rifle
3 and a bolt-action 22-250 caliber rifle for \$700.
4 (173) On or about May 13, 2010, defendant JENNIFER
5 ESCAMILLA transported \$2,900 from San Diego to
6 Tijuana, Mexico.
7 (174) On or about May 13, 2010, at the direction of
8 defendant EDGAR GUSTAVO ESCAMILLA, defendant
9 ROCIO LOPEZ "fronted" a half-pound of
10 methamphetamine to CI-1.
11 (175) On or about May 13, 2010, defendant EDGAR LOPEZ
12 DE-ANDA DAHER agreed, on behalf of defendant
13 RUBEN DARIO CASTRO PEREZ, to use his law
14 enforcement contacts to secure the release of two
15 drug couriers who had been arrested in Mexico.
16 (176) On or about May 14, 2010, defendants EDGAR LOPEZ
17 DE-ANDA DAHER and RUBEN DARIO CASTRO PEREZ
18 discussed a \$100,000 payment owed to CASTRO by
19 "Yahaira."
20 (177) On or about May 15, 2010, defendant RUBEN DARIO
21 CASTRO PEREZ instructed defendant EDGAR LOPEZ
22 DE-ANDA DAHER to call the "prosecutor" because
23 the military had arrested an individual who
24 operated "the ranch" for Castro.
25 (178) On or about May 18, 2010, at the direction of
26 defendant JOSE ALFREDO NAJERA GIL, defendant
27 OSCAR DANIEL MONTOYA MORA traveled from Tijuana,
28 Mexico, to San Diego.

1 (179) On or about May 18, 2010, defendant OSCAR DANIEL
2 MONTOYA picked up \$5750 from CI-1 and then
3 transported that money from San Diego,
4 California, to Tijuana, Mexico.

5 (180) On or about May 18, 2010, defendant OMAR MORA
6 directed a law enforcement officer acting in an
7 undercover capacity and CI-3 to the residence of
8 J.C. in National City, California.

9 (181) On or about May 18, 2010, defendant JOSE ALFREDO
10 NAJERA GIL instructed CI-3 to go forward with the
11 kidnaping of J.C. because the kidnaping would
12 generate anywhere from \$500,000 to \$1,000,000.

13 (182) On or about May 18, 2010, at the direction of
14 defendants EDGAR GUSTAVO ESCAMILLA and IGNACIO
15 ESCAMILLA ESTRADA, defendant JENNIFER ESCAMILLA
16 transported \$6,500 from San Diego to Tijuana,
17 Mexico.

18 (183) On or about May 18, 2010, defendant JORGE
19 HUMBERTO LORA sold a "cs" grenade, a Mossberg
20 shotgun and .22 caliber handgun to CI-1 for \$750.

21 (184) On or about May 18, 2010, defendant JOSE ANTONIO
22 ORTEGA NUNO agreed to provide defendant CARLOS
23 COSME with a photographic roster of current Baja
24 California State Police Officers in exchange for
25 a \$1,000 payment.

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1 (185) On or about May 18, 2010, in Tijuana, Mexico, and
2 at the direction defendants JOSE ALFREDO NAJERA
3 GIL and RUBEN DARIO CASTRO PEREZ, Cristian LNU,
4 aka Elmer, removed the headstone from the
5 gravesite of Efrain Alvarez Gonzalez and Abel
6 Joatan Gonzalez.

7 (186) On or about May 18, 2010, in Tijuana, Mexico, and
8 at the direction defendants JOSE ALFREDO NAJERA
9 GIL and RUBEN DARIO CASTRO PEREZ, Cristian LNU,
10 aka Elmer, transported the headstone from the
11 gravesite of Efrain Alvarez Gonzalez and Abel
12 Joatan Gonzalez to the residence of D.A., where
13 he left the headstone and a threatening message
14 in front of the entryway to the home.

15 (187) On or about May 18, 2010, defendant RUBEN DARIO
16 CASTRO PEREZ told defendant JOSE ALFREDO NAJERA
17 GIL that he was going to make the family members
18 of Efrain Alvarez Gonzalez and Abel Joatan
19 Gonzalez suffer and move out of their home.

20 (188) On or about May 18, 2010, defendant Ruben DARIO
21 CASTRO PEREZ told defendant JOSE ALFREDO NAJERA
22 GIL that if the family members of Efrain Alvarez
23 Gonzalez and Abel Joatan Gonzalez did not move
24 out of their house, he was going to kill them.

25 (189) On or about May 20, 2010, at the direction of
26 defendant EDGAR GUSTAVO ESCAMILLA, defendant
27 ROCIO LOPEZ sold a half-pound of methamphetamine
28 to CI-1 for \$6,500.

1 (190) On or about May 20, 2010, at the direction of
2 defendant IVAN CANDELARIO MAGANA HEREDIA, one or
3 more individuals shot J.L.Q.C., believing
4 J.L.Q.C. to be F.B., a high-ranking Mexican law
5 enforcement official.

6 (191) On or about May 27, 2010, defendant CARLOS COSME
7 agreed to sell CI-3 a photographic roster of
8 current Baja California State Police Officers in
9 exchange for a \$500 payment.

10 (192) On or about May 28, 2010, defendant CARLOS COSME
11 sold CI-3 a photographic roster of current Baja
12 California State Police Officers in exchange for
13 a \$500 payment.

14 (193) On or about May 28, 2010, defendant OMAR MORA and
15 other individuals attempted to locate and kidnap
16 J.C. in National City, California.

17 (194) On or about May 28, 2010, defendant CHRISTOPHER
18 ADRIAN RUIZ told defendant EDGAR GUSTAVO
19 ESCAMILLA that he was going to shoot "Mark" in
20 the kneecaps and put him in the hospital instead
21 of killing him because Ruiz still hoped to
22 collect the money that "Mark" owed.

23 (195) On or about June 1, 2010, defendant IVAN
24 CANDELARIO MAGANA HEREDIA ordered the murder of
25 Antonio Rodriguez Soltero, aka Piratita.

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1 (196) On or about June 1, 2010, defendants ARMANDO
2 VILLAREAL HEREDIA, IVAN CANDELARIO MAGANA HEREDIA
3 and CARLOS COSME made arrangements to steal fifty
4 pounds of methamphetamine, which was being
5 transported from the interior of Mexico to
6 Tijuana via a commercial bus line.

7 (197) On or about June 2, 2010, defendant OSCAR DANIEL
8 MONTOYA Mora informed defendant EDGAR LOPEZ
9 DE-ANDA DAHER that defendant JOSE ALFREDO NAJERA
10 GIL was in control of "the money coming in"
11 because defendant RUBEN DARIO CASTRO PEREZ had
12 been arrested.

13 (198) On or about June 3, 2010, defendant IVAN
14 CANDELARIO MAGANA HEREDIA recruited defendant
15 ULISES VALENZUELA to murder M.S. in San Diego,
16 California.

17 (199) On or about June 3, 2010, defendant CHRISTOPHER
18 ADRIAN RUIZ possessed a sawed-off shotgun and
19 shotgun ammunition.

20 (200) On or about June 3, 2010, defendant JUAN CARLOS
21 MAGANA HEREDIA informed defendant IVAN CANDELARIO
22 MAGANA HEREDIA that he was going to make Andrew
23 Martinez (charged elsewhere) deliver
24 approximately 15 pounds of cocaine from San Diego
25 to Los Angeles.

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1 (201) On or about June 3, 2010, defendant IVAN
2 CANDELARIO MAGANA HEREDIA stated that he would
3 "cash the check" of Andrew Martinez (charged
4 elsewhere), that is, kill Martinez, after
5 Martinez delivered approximately 15 pounds of
6 cocaine to Los Angeles.

7 (202) On or about June 4, 2010, defendants IVAN
8 CANDELARIO MAGANA HEREDIA and JUAN CARLOS MAGANA
9 HEREDIA possessed approximately 15 pounds of
10 cocaine.

11 (203) On or about June 6, 2010, defendant JOSE ALFREDO
12 NAJERA GIL asked defendant JESUS QUINONES MARQUEZ
13 to "help out" with the situation involving
14 "Gabby," who Najera stated was being targeted by
15 Mexican law enforcement officers investigating
16 the murder of Marisol Fuerte Aguinon on March 25,
17 2010, in Tijuana, Mexico.

18 (204) On or about June 7, 2010, defendants JOSE
19 ALEJANDRO FLORES MEZA, JORGE ALBERTO RAMIREZ
20 PONCE and Humberto LNU made arrangements to
21 conduct surveillance in support of their efforts
22 to kidnap A.M. in Tijuana, Mexico.

23 (205) On or about June 15, 2010, defendant OSCAR DANIEL
24 MONTOYA MORA transported approximately \$105,000
25 from defendant Alicia Martinez's residence in San
26 Diego to Tijuana, Mexico.

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1 (206) On or about June 15, 2010, defendant ALICIA
2 MARTINEZ possessed \$81,000.

3 (207) On or about June 21, 2010, defendant JUAN CARLOS
4 MAGANA caused \$285,620 to be transported from San
5 Diego to defendant IVAN CANDELARIO MAGANA HEREDIA
6 in Tijuana, Mexico.

7 All in violation of Title 18, United States Code, Section 1962(d).

8 FORFEITURE ALLEGATION

9 9. All of the allegations contained in Count 1 of this
10 Indictment are hereby realleged and incorporated by reference herein
11 as though fully set forth for the purpose of alleging forfeiture
12 pursuant to the provisions of Title 18, United States Code,
13 Section 1963. Pursuant to Federal Rules of Criminal Procedure,
14 Rule 32.2, notice is hereby given to the above-named defendants that
15 the United States will seek forfeiture as part of any sentence in
16 accordance with Title 18, United States Code, Section 1963, in the
17 event of any defendant's conviction under Count One of this Indictment.

18 a. Defendants ARMANDO VILLAREAL HEREDIA, aka Gordo,
19 aka Gordo Villareal, RUBEN DARIO CASTRO PEREZ, aka Compadre,
20 aka Choques, IVAN CANDELARIO MAGANA HEREDIA, aka Soldado, JOSE ALFREDO
21 NAJERA GIL, CARLOS COSME, MARIO ESCAMILLA, aka Unico, IGNACIO
22 ESCAMILLA ESTRADA, aka Uno, aka Senor, FAUSTO ESCAMILLA ESTRADA,
23 aka Taliban, EDGAR GUSTAVO ESCAMILLA, aka Dies, JESUS QUINONES
24 MARQUEZ, aka Rinon, JOSE ANTONIO ORTEGA NUNO, EDGAR LOPEZ DE-ANDA
25 DAHER, aka Pollito, JOSE ALEJANDRO FLORES MEZA, aka Shakira, ALICIA
26 MARTINEZ, aka Comadre, JUAN CARLOS MAGANA HEREDIA, OSCAR DANIEL
27 MONTOYA MORA, JORGE ALBERTO RAMIREZ PONCE, aka Betote, MIKAEL DANIEL
28 BLASER, aka Troubles, JONATHAN VALLE, aka Reaper, ARMANDO CASTILLO,

1 aka Choco, OMAR MARTINEZ, aka Nino, ENRIQUE SALINAS, JR., aka Playboy,
 2 RAUL MORENO, aka Flaco, MIGUEL SORIA, aka Mikey, PERLA YADIRA FLORES,
 3 aka P, LUZ MARIA BENAVIDEZ MARTINEZ, aka Araceli, BRIDGETTE REYNOSO,
 4 aka B, JORGE HUMBERTO LORA, aka Georgie, CHRISTOPHER ADRIAN RUIZ,
 5 aka Sneaky, RICHARD GILBERT FAVELA, aka Tiny, HUMBERTO TORRES MENDOZA,
 6 aka Tito, JUAN CARLOS RIQUE AGUIRRE, aka JC, TELLIE KRESCHMER, HECTOR
 7 MONTES, aka Toxic, aka Little Spikey, JOSE CONTRERAS, aka Pepe,
 8 aka Dandi, HASSAIN ALZUBAIDY, aka Arab, OMAR MORA, ULISES VALENZUELA,
 9 BENJAMIN AVENDANO, aka Peso, JENNIFER ESCAMILLA, ARACELI VARELA,
 10 aka Uvia, ROCIO LOPEZ, KEVIN LUIS, aka Listo have acquired and
 11 maintained interests in violation of Title 18, United States Code,
 12 Section 1962, which interests are subject to forfeiture to the United
 13 States pursuant to Title 18, United States Code, Section 1963(a)(1);
 14 and

15 b. Defendants ARMANDO VILLAREAL HEREDIA, aka Gordo,
 16 aka Gordo Villareal, RUBEN DARIO CASTRO PEREZ, aka Compadre,
 17 aka Choques, IVAN CANDELARIO MAGANA HEREDIA, aka Soldado, JOSE ALFREDO
 18 NAJERA GIL, CARLOS COSME, MARIO ESCAMILLA, aka Unico, IGNACIO
 19 ESCAMILLA ESTRADA, aka Uno, aka Senor, FAUSTO ESCAMILLA, aka Taliban,
 20 EDGAR GUSTAVO ESCAMILLA, aka Dies, JESUS QUINONES MARQUEZ, aka Rinon,
 21 JOSE ANTONIO ORTEGA NUNO, EDGAR LOPEZ DE-ANDA DAHER, aka Pollito, JOSE
 22 ALEJANDRO FLORES MEZA, aka Shakira, ALICIA MARTINEZ, aka Comadre, JUAN
 23 CARLOS MAGANA HEREDIA, OSCAR DANIEL MONTOYA MORA, JORGE ALBERTO
 24 RAMIREZ PONCE, aka Betote, MIKAEL DANIEL BLASER, aka Troubles,
 25 JONATHAN VALLE, aka Reaper, ARMANDO CASTILLO, aka Choco, OMAR
 26 MARTINEZ, aka Nino, ENRIQUE SALINAS, JR., aka Playboy, RAUL MORENO,
 27 aka Flaco, MIGUEL SORIA, aka Mikey, PERLA YADIRA FLORES, aka P, LUZ
 28 MARIA BENAVIDEZ MARTINEZ, aka Araceli, BRIDGETTE REYNOSO, aka B, JORGE

1 HUMBERTO LORA, aka Georgie, CHRISTOPHER ADRIAN RUIZ, aka Sneaky,
2 RICHARD GILBERT FAVELA, aka Tiny, HUMBERTO TORRES MENDOZA, aka Tito,
3 JUAN CARLOS RIQUE AGUIRRE, aka JC, TELLIE KRESCHMER, HECTOR MONTES,
4 aka Toxic, aka Little Spikey, JOSE CONTRERAS, aka Pepe, aka Dandi,
5 HASSAIN ALZUBAIDY, aka Arab, OMAR MORA, ULISES VALENZUELA, BENJAMIN
6 AVENDANO, aka Peso, JENNIFER ESCAMILLA, ARACELI VARELA, aka Uvia,
7 ROCIO LOPEZ, KEVIN LUIS, aka Listo have an interest in, security of,
8 claims against, and property and contractual rights which afford a
9 source of influence over, the enterprise described herein which the
10 defendants established, operated, controlled, conducted, and
11 participated in the conduct of, in violation of Title 18, United
12 States Code, Section 1962, which interests, securities, claims, and
13 rights are subject to forfeiture to the United States pursuant to
14 Title 18, United States Code, Section 1963(a)(2); and

15 c. Defendants ARMANDO VILLAREAL HEREDIA, aka Gordo,
16 aka Gordo Villareal, RUBEN DARIO CASTRO PEREZ, aka Compadre,
17 aka Choques, IVAN CANDELARIO MAGANA HEREDIA, aka Soldado, JOSE ALFREDO
18 NAJERA GIL, CARLOS COSME, MARIO ESCAMILLA, aka Unico, IGNACIO
19 ESCAMILLA ESTRADA, aka Uno, aka Senor, FAUSTO ESCAMILLA, aka Taliban,
20 EDGAR GUSTAVO ESCAMILLA, aka Dies, JESUS QUINONES MARQUEZ, aka Rinon,
21 JOSE ANTONIO ORTEGA NUNO, EDGAR LOPEZ DE-ANDA DAHER, aka Pollito, JOSE
22 ALEJANDRO FLORES MEZA, aka Shakira, ALICIA MARTINEZ, aka Comadre, JUAN
23 CARLOS MAGANA HEREDIA, OSCAR DANIEL MONTOYA MORA, JORGE ALBERTO
24 RAMIREZ PONCE, aka Betote, MIKAEL DANIEL BLASER, aka Troubles,
25 JONATHAN VALLE, aka Reaper, ARMANDO CASTILLO, aka Choco, OMAR
26 MARTINEZ, aka Nino, ENRIQUE SALINAS, JR., aka Playboy, RAUL MORENO,
27 aka Flaco, MIGUEL SORIA, aka Mikey, PERLA YADIRA FLORES, aka P, LUZ
28 MARIA BENAVIDEZ MARTINEZ, aka Araceli, BRIDGETTE REYNOSO, aka B, JORGE

1 HUMBERTO LORA, aka Georgie, CHRISTOPHER ADRIAN RUIZ, aka Sneaky,
2 RICHARD GILBERT FAVELA, aka Tiny, HUMBERTO TORRES MENDOZA, aka Tito,
3 JUAN CARLOS RIQUE AGUIRRE, aka JC, TELLIE KRESCHMER, HECTOR MONTES,
4 aka Toxic, aka Little Spikey, JOSE CONTRERAS, aka Pepe, aka Dandi,
5 HASSAIN ALZUBAIDY, aka Arab, OMAR MORA, ULISES VALENZUELA, BENJAMIN
6 AVENDANO, aka Peso, JENNIFER ESCAMILLA, ARACELI VARELA, aka Uvia,
7 ROCIO LOPEZ, KEVIN LUIS, aka Listo have property constituting and
8 derived from proceeds obtained, directly and indirectly, from the
9 racketeering activity described in this Indictment, in violation of
10 Title 18, United States Code, Section 1962, which property is subject
11 to forfeiture to the United States pursuant to Title 18, United States
12 Code, Section 1963(a)(3).

13 10. The interests of the defendants subject to forfeiture to
14 the United States pursuant to Title 18, United States Code,
15 Sections 1963(a)(1), (a)(2) and (a)(3), include but are not limited
16 to all interests and proceeds traceable thereto, including
17 approximately \$10,000,000.00.

18 11. Each of the defendants are jointly and severally liable
19 for the forfeiture obligations alleged above.

20 12. If any of the above-described forfeitable property, as a
21 result of any act or omission of the defendants:

- 22 a. cannot be located upon the exercise of due diligence;
- 23 b. has been transferred or sold to, or deposited with, a
24 third person;
- 25 c. has been placed beyond the jurisdiction of the Court;
- 26 d. has been substantially diminished in value; or
- 27 e. has been commingled with other property which cannot
28 be subdivided without difficulty;

1 it is the intent of the United States, pursuant to Title 18, United
2 States Code, Section 1963(m), to seek forfeiture of any other property
3 of said defendants up to the value of the above forfeitable property.
4 All pursuant to Title 18, United States Code, Section 1963.

5 DATED: July 29, 2010.

6 A TRUE BILL:

7 *Dianne Ratzke*
8 Foreperson

9
10 LAURA E. DUFFY
11 United States Attorney

12 By: *Todd Robinson*
13 TODD W. ROBINSON
14 Assistant U.S. Attorney

15 By: *JPM*
16 JAMES P. MELENDRES
17 Assistant U.S. Attorneys
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